

**BonaparteIN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico**

In the Matter of:

EVELYN PANTOJA CARRION

Debtor(s)

Case No. **07-02726 SEK**

Chapter 13

**INFORMATIVE MOTION ABOUT ACTIONS TAKEN IN THE CASE
TO THE HONORABLE COURT:**

The undersigned, attorney for the above-named debtors, notifies the Court as follows,

1. During the period granted by the court to clarify the status of debtor's mortgage payments we called PRAMCO legal representative to get a history of the post petition payments made by debtor. We could not get from the Creditor's attorney a up to date history, but received the name a address of the servicing agent for PRAMCO. The name of the person we called is Mariam Hernandez, phone number 1-585-377-2810 extension 401. We left message and received a reply by September 10, 2010. Ms. Hernandez promised to provide the information as soon as possible by e-mail, but until now we have received nothing. It usually happens in cases where a secured creditor does not have a physical office in Puerto Rico that it becomes painful to verify the status of an account. We will need additional time to complete our investigation.
2. We will appreciate creditor's attorney to help in that endeavor because it is possible other means of communication exist to contact his client that we do not have access to. More than calculations and allegations, we need an official record of post petition payments.

WHEREFORE, we respectfully request from this Honorable Court to take notice of the previously informed and grant debtor another thirty days to file the result of our investigation before taking any action regarding the request of relief of stay.

I HEREBY CERTIFY, that on this date I electronically filed the above document with the Clerk of the Court using ECF/CM system which sends notification of such filing to the Chapter 13 trustee Jose R. Carrion and to Mrs. Sergio A. Ramirez de Arellano, Esq. attorney for secured creditor PRAMCO..

In Vega Baja, Puerto Rico, on this September 27, 2010.

s/ *Juan O. Calderon Lithgow*

JUAN O. CALDERON LITHGOW

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